

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF OHIO

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

MDL NO. 2804

Civ. No. 1:17-md-02804-DAP

THIS DOCUMENT RELATES TO:

JUDGE POLSTER

Track One Cases

DEFENDANTS' AMENDED JOINT WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26, the Defendants listed below hereby disclose the following witnesses who may testify at trial on their behalf.¹ This joint defense witness list is made on behalf of the following Defendants: AmerisourceBergen Drug Corporation and AmerisourceBergen Corporation; Cardinal Health, Inc.; Henry Schein, Inc. and

¹ Defendants serve this joint list for purposes of efficiency and to avoid burdening the Court with overlapping or potentially duplicative witness lists. Inclusion of any particular witness, including expert witnesses, on this list does not indicate that every Defendant intends to individually offer that listed witness. Defendants incorporate by reference their previous statements regarding which parties are offering which expert witnesses.

Henry Schein Medical Systems, Inc.; McKesson Corporation; Teva Pharmaceutical Industries LTD, Teva Pharmaceuticals, USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, Warner Chilcott Company, LLC, Actavis Pharma, Inc. f/k/a Watson Pharma, Inc., Actavis South Atlantic LLC, Actavis Elizabeth LLC, Actavis Mid Atlantic LLC, Actavis Totowa LLC, Actavis Kadian LLC, Actavis Laboratories UT, Inc. f/k/a Watson Laboratories, Inc. – Salt Lake City, Actavis Laboratories FL, Inc., f/k/a Watson Laboratories, Inc. – Florida; Walgreen Co. and Walgreen Eastern Co. This list is in addition to those witnesses identified on the named Defendants’ Individual or Group Witness Lists and in addition to witnesses that may be played as part of these Defendants’ videotaped designations or counter-designations.

In serving this joint witness list, Defendants specifically reserve the right to amend, supplement, or otherwise modify these disclosures if new or modified information is provided at any point. Defendants also reserve the right to supplement and/or to amend their lists with any witnesses identified on any party’s witness lists, including any party who later settles or is severed or dismissed. Defendants’ further reserve the right to supplement and/or to amend this witness list in response to rulings of the Court on pretrial motions. Defendants reserve the right to call any of these witnesses and any of Plaintiffs’ 30(b)(6) witnesses whose testimony is designated² as live witnesses in their case in chief.

² This includes Margaret June Carr, Thomas Gilson, James Gutierrez, Greta Johnson, Maggie Keenan, Brian Nelsen, Hugh Shannon, and Holly Woods.

A. Expert Witnesses

1. Bruce Bagley, Ph.D., Professor of International Studies at the University of Miami.

Areas of Testimony: Dr. Bagley is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

2. Gregory K. Bell Ph.D., M.B.A., Group Vice President and Life Sciences Practice Leader, Charles River Associates.

Areas of Testimony: Dr. Bell is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

3. Matt Bialecki CPA, CFF, CGMA, Managing Director of Alvarez & Marsal Disputes and Investigations, LLC.

Areas of Testimony: Mr. Bialecki is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

4. Pradeep Chintagunta, Ph.D., Joseph T. and Bernice S. Lewis Distinguished Service Professor of Marketing at the Graduate School of Business at the University of Chicago.

Areas of Testimony: Dr. Chintagunta is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

5. Adam J. Fein, Ph.D., President, Pembroke Consulting.

Areas of Testimony: Dr. Fein is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

6. Larry N. Holifield, Co-Founder and Director Corporate Integrity Services LLC.

Areas of Testimony: Mr. Holifield is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

7. James W. Hughes, Ph.D., Professor Emeritus of Economics at Bates College.

Areas of Testimony: Dr. Hughes is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

8. Heath Jolliff, DO, Clinical Professor of Emergency Medicine at the Ohio University Heritage College of Osteopathic Medicine; Associate Program Director for the Emergency Medicine Residency Program at Adena

Regional Medical Center; founder of and medical toxicologist at Mid-Ohio Toxicology Services, LLC; and consulting medical toxicologist at Doctors Hospital-OhioHealth.

Areas of Testimony: Dr. Jolliff is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

9. Jonathan Ketcham, Ph.D., Earl G. and Gladys C. Davis Distinguished Research Professor in Business at the W.P. Carey School of Business at Arizona State University.

- a) Areas of Testimony: Dr. Ketcham is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

10. David A. Kvancz, MS, R.Ph., FASHP, Senior Vice President, Strategic Client Relationships for Visante and President of Valore Healthcare Consulting, LLC.

Areas of Testimony: Mr. Kvancz is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

11. Rob Lyerla, Ph.D. MGIS, Professor in the Interdisciplinary Health Sciences PhD program at Western Michigan University and a former Captain in the U.S. Public Health Service.

- a) Areas of Testimony: Dr. Lyerla is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

12. Kevin Murphy, Ph.D., George J. Stigler Distinguished Service Professor of Economics in the Department of Economics and Booth School of Business at The University of Chicago.

Areas of Testimony: Dr. Murphy is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

13. Jessica Pollner, Ph.D., Retired Principal of PricewaterhouseCoopers.

Areas of Testimony: Dr. Pollner is expected to testify about the opinions detailed in her expert report and on matters concerning her knowledge, skill, experience, education, and training.

14. Catherine Rahilly-Tierney, M.D., M.P.H., Instructor in Medicine at Harvard Medical School; Associate Epidemiologist at Brigham & Women's Hospital; Assistant Professor in Medicine at Boston University; and Staff Physician at VA Boston Healthcare System.

Areas of Testimony: Dr. Rahilly-Tierney is expected to testify about the opinions detailed in her expert report and on matters

concerning her knowledge, skill, experience, education, and training.

15. Edgar L. Ross, M.D., Director of the Pain Management Fellowship Program at Brigham and Women's Hospital; Associate Professor at Harvard Medical School.

Areas of Testimony: Dr. Ross is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

16. Douglas Tucker, M.D., Clinical Professor of Psychiatry in the Department of Psychiatry at the University of California, San Francisco (UCSF) School of Medicine.

- a) Areas of Testimony: Dr. Tucker is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

17. Marc Sweeney, R.Ph., Pharm.D., Dean of the School of Pharmacy at Cedarville University.

Areas of Testimony: Dr. Sweeney is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

18. Dennis Wichern, former Drug Enforcement Administration (“DEA”) Special Agent and founder of Prescription Drug Consulting, LLC.

Areas of Testimony: Mr. Wichern is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

19. R.K. Wright, M.D., J.D., Fellow for the American Society of Clinical Pathology and the College of American Pathologists.

Areas of Testimony: Dr. Wright is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

B. Fact Witnesses³

1. Demetra Ashley,* Former Acting Assistant Administrator to the Diversion Control Center.

Areas of Testimony: Ms. Ashley is expected to testify concerning her duties and responsibilities as the Former Acting Assistant Administrator to the Diversion Control Center and related to her previous relevant employment.

2. Hylton Baker, Captain, Sheriff's Department, Summit County, Former Commander of Summit County Drug Unit.

Areas of Testimony: Mr. Baker is expected to testify concerning his duties and responsibilities as a Sheriff's Department Police Officer, as a Former Commander of Summit County Drug Unit, and related to his previous relevant employment.

3. Julie Barnes, Executive Director of Children's Services, Summit County.

Areas of Testimony: Ms. Barnes is expected to testify concerning her duties and responsibilities as Executive Director of Children's Services, Summit County and related to her previous relevant employment.

³ Witnesses listed with an asterisk are witnesses for whom Defendants designated deposition testimony for trial.

4. Gary Brack, MetroHealth's Interim Director of Ambulatory Care at Cuyahoga County Jail.

Areas of Testimony: Mr. Brack is expected to testify concerning his duties and responsibilities as Interim Director of Ambulatory Care at Cuyahoga County Jail and related to his previous relevant employment.

5. Vince Caraffi, Supervisor at Cuyahoga County Board of Health; Former Chair of Cuyahoga County Opiate Task Force.

Areas of Testimony: Mr. Caraffi is expected to testify concerning his duties and responsibilities as Supervisor at Cuyahoga County Board of Health, as the Former Chair of Cuyahoga County Opiate Task Force, and related to his previous relevant employment.

6. Margaret Carr,* Director of Employee Benefits for Summit County.

Areas of Testimony: Ms. Carr is expected to testify concerning her duties and responsibilities as the Director of Employee Benefits for Summit County, her previous employment, and the topics for which she was designated as a 30(b)(6) witness.

7. Jerry Craig, Executive Director Summit County ADAMHS Board.

Areas of Testimony: Mr. Craig is expected to testify concerning matters related to his duties and responsibilities as Executive

Director of the Summit County ADAMHS Board and related to his previous relevant employment.

8. Chad Garner, Director of OARRS for the Ohio Board of Pharmacy.

Areas of Testimony: Mr. Garner is expected to testify concerning matters related to his duties and responsibilities as Director of OARRS for the Ohio Board of Pharmacy and related to his previous relevant employment.

9. Thomas Gilson,* Chief Medical Examiner, Cuyahoga County.

Areas of Testimony: Mr. Gilson is expected to testify concerning matters related to his duties and responsibilities as Chief Medical Examiner for Cuyahoga County, his previous relevant employment, and the topics for which he was designated as a 30(b)(6) witness.

10. Merle Gordon, Director of the Cleveland Department of Public Health.

Areas of Testimony: Ms. Gordon is expected to testify concerning matters related to her duties and responsibilities as Director of the Cleveland Department of Public Health and related to her previous relevant employment.

11. Eric Griffin,* the Director of Compliance and Enforcement for the Ohio State Board of Pharmacy.

Areas of Testimony: Mr. Griffin is expected to testify concerning matters related to his duties and responsibilities as Director of Compliance and Enforcement for the Ohio State Board of Pharmacy.

12. James Gutierrez, * Assistant Prosecutor of Cuyahoga County Prosecutor's Office.

Areas of Testimony: Mr. Gutierrez is expected to testify concerning matters related to his duties and responsibilities as Assistant Prosecutor of Cuyahoga County Prosecutor's Office, his previous relevant employment, and the topics for which he was designated as a 30(b)(6) witness.

13. Gregory Hall, Cuyahoga County Board of Health Board Member.

Areas of Testimony: Mr. Hall is expected to testify concerning matters related to his duties and responsibilities as a Board Member on the Cuyahoga County Board of Health and related to his previous relevant employment.

14. Orman Hall, Executive Director of the Fairfield County ADAMHS Board, Former Chair of Governor's Opiate Action Team.

Areas of Testimony: Mr. Hall is expected to testify concerning matters related to his duties and responsibilities as Director of the

ADAMHS Board, Former Chair of the Governor's Opiate Action Team and related to his previous relevant employment.

15. Stacy Harper-Avilla,* Section Chief on Quotas, DEA.

Areas of Testimony: Ms. Harper-Avilla is expected to testify concerning matters related to her duties and responsibilities as Section Chief on Quotas at DEA and related to her previous relevant employment.

16. June Howard,* Chief, Targeting and Analysis Unit.

Areas of Testimony: Ms. Howard is expected to testify concerning matters related to her duties and responsibilities as Chief, Targeting and Analysis Unit and related to her previous relevant employment.

17. Mark Hurst, Director of the Ohio Department of Mental Health and Addiction Services.

Areas of Testimony: Mr. Hurst is expected to testify concerning matters related to his duties and responsibilities as Director of the State Department of Mental Health and Addiction Services and related to his previous relevant employment.

18. Greta Johnson,* Assistant Chief of Staff, Summit County Executive's Office.

Areas of Testimony: Ms. Johnson is expected to testify concerning matters related to her duties and responsibilities as the Assistant Chief of Staff, Summit County Executive Offices, her previous relevant employment, and the topics for which she was designated as a 30(b)(6) witness.

19. Claire Kaspar, Forensic Toxicologist at the Cuyahoga County Medical Examiner's Office.

Areas of Testimony: Ms. Kasper is expected to testify concerning matters related to her duties and responsibilities as Forensic Toxicologist at the Cuyahoga County Medical Examiner's Office and related to her previous relevant employment.

20. Maggie Keenan,* Director of the Cuyahoga Office of Budget and Management.

Areas of Testimony: Ms. Keenan is expected to testify concerning matters related to her duties and responsibilities as Director of the Cuyahoga Office of Budget and Management, her previous relevant employment, and the topics for which she was designated as a 30(b)(6) witness.

21. Lisa Kohler, Chief Medical Examiner, Summit County.

Areas of Testimony: Ms. Kohler is expected to testify concerning matters related to her duties and responsibilities as Chief Medical Examiner of Summit County and related to her previous relevant employment.

22. Louis LaMarca, Clinical Director for Community Assessment & Treatment Services.

Areas of Testimony: Mr. LaMarca is expected to testify concerning matters related to his duties and responsibilities as Clinical Director for Community Assessment & Treatment Services and related to his previous relevant employment.

23. Patrick Leonard, Detective in the Akron Police Department and Diversion Detective in the DEA Tactical Diversion Task Force.

Areas of Testimony: Mr. Leonard is expected to testify concerning matters related to his duties and responsibilities as a police officer in both the Akron Police Department and the DEA Task Force.

24. Allisyn Leppla, Former Program Manager, Cuyahoga County Board of Health; Former member of the Cuyahoga County Opiate Task Force.

Areas of Testimony: Ms. Leppla is expected to testify concerning her former duties and responsibilities as the Program Manager for the Cuyahoga County Board of Health, as a former member of the

Cuyahoga County Opiate Task Force, and related to her previous relevant employment.

25. Michael Mapes,* Former DEA Diversion Investigator.

Areas of Testimony: Mr. Mapes is expected to testify concerning his former duties and responsibilities as a DEA Diversion Investigator and related to his previous relevant employment.

26. Keith Martin,* Assistant Special Agent, DEA.

Areas of Testimony: Mr. Martin is expected to testify concerning his duties and responsibilities as an Assistant Special Agent at DEA and related to his previous relevant employment.

27. Kenneth Mills, Former Jail Director, Cuyahoga County.

Areas of Testimony: Mr. Mills is expected to testify concerning his duties and responsibilities as the Former Jail Director in Cuyahoga Office and related to his previous relevant employment.

28. Chris Murray, Director of Cuyahoga Office of the Treasury.

Areas of Testimony: Mr. Murray is expected to testify concerning his duties and responsibilities as the Director of Cuyahoga Office of the Treasury and related to his previous relevant employment.

29. Brian Nelsen,* Summit County's Director of Budget and Finance.

Areas of Testimony: Mr. Nelsen is expected to testify concerning his duties and responsibilities as Summit County's Director of Budget and Finance, his previous relevant employment, and the topics for which he was designated as a 30(b)(6) witness.

30. Joan Papp, Director of the Office of Opioid Safety at MetroHealth; Member of Cuyahoga County Opiate Task Force.

Areas of Testimony: Ms. Papp is expected to testify concerning her duties and responsibilities as the Director of the Office of Opioid Safety at MetroHealth, as a member of the Cuyahoga County Opiate Task Force, and related to her previous relevant employment.

31. Walter Parfejewiec, Director of Health and Human Services, Cuyahoga County.

Areas of Testimony: Mr. Parfejewiec is expected to testify concerning his duties and responsibilities as the Director of Health and Human Services, Cuyahoga County and related to his previous relevant employment.

32. Steve Perch, Toxicologist, Summit County.

Areas of Testimony: Mr. Perch is expected to testify concerning his duties and responsibilities as a toxicologist in Summit County, and related to his previous relevant employment.

33. Victor Perez, Former Chief Prosecutor of the City of Cleveland.

Areas of Testimony: Mr. Perez is expected to testify concerning his duties and responsibilities as the former Chief Prosecutor of the City of Cleveland and related to his previous relevant employment.

34. Thomas Prevoznik,* Associate Section Chief for the Pharmaceutical Investigations Section of the Diversion Control Division, DEA.

Areas of Testimony: Mr. Prevoznik is expected to testify concerning his duties and responsibilities as the Associate Section Chief for the Pharmaceutical Investigations Section of the Diversion Control Division at DEA and related to his previous relevant employment.

35. John Prince, Cleveland Police Detective, DEA Tactical Diversion Squad.

Areas of Testimony: Detective Prince is expected to testify concerning his duties and responsibilities as a police officer in the Cleveland Police Department, as a detective on DEA's Tactical Diversion Squad, and related to his previous relevant employment.

36. Joseph Rannazzisi,* Former Head of Office of Diversion Control, DEA.

Areas of Testimony: Mr. Rannazzisi is expected to testify concerning his duties and responsibilities as the Former Head of

Office of Diversion Control, DEA and related to his previous relevant employment.

37. Patricia Rideout*, Former Director of Cuyahoga County Department of Children and Family Services.

Areas of Testimony: Ms. Rideout is expected to testify concerning her duties and responsibilities as the Former Director of Cuyahoga County Department of Children and Family Services and related to her previous relevant employment.

38. John Saros*, Former Executive Director of Summit County Department of Children Services.

Areas of Testimony: Mr. Saros is expected to testify concerning his duties and responsibilities as the Former Director of Summit County Department of Children Services and related to his previous relevant employment.

39. Hugh Shannon*, Administrator for the Cuyahoga County Medical Examiner's Office.

Areas of Testimony: Mr. Shannon is expected to testify concerning matters related to his duties and responsibilities as the Administrator of the Cuyahoga County Medical Examiner's Office, his previous relevant employment, and the topics for which he was designated as a 30(b)(6) witness.

40. Derek Siegle, Executive Director of the Ohio High Intensity Drug Trafficking Area (“HIDTA”).

Areas of Testimony: Mr. Siegle is expected to testify concerning matters related to his duties and responsibilities as the Executive Director of Ohio HIDTA and related to his previous relevant employment.

41. Doug Smith, Chief Clinical Officer for Summit County’s ADAMHS Board.

Areas of Testimony: Mr. Smith is expected to testify concerning matters related to his duties and responsibilities as Chief Clinical Officer for Summit County’s ADAMHS Board and related to his previous relevant employment.

42. Matthew Strait,* Senior Policy Advisor, DEA

Areas of Testimony: Mr. Strait is expected to testify concerning his duties and responsibilities as Senior Policy Advisor for DEA and related to his previous relevant employment.

43. Holly Woods,* Director of Human Resources for Benefits and Compensation for Cuyahoga County.

Areas of Testimony: Ms. Woods is expected to testify concerning matters related to her duties and responsibilities as the Director of

Human Resources for Benefits and Compensation for Cuyahoga County, her previous relevant employment, and the topics for which she was designated as a 30(b)(6) witness.

44. Kyle J. Wright,* Staff Coordinator Regulatory Section, DEA

Areas of Testimony: Mr. Wright is expected to testify concerning matters related to his duties and responsibilities as a Staff Coordinator Regulatory Section at DEA and related to his previous relevant employment.

Dated: October 7, 2019

Respectfully Submitted,

/s/ Shannon E. McClure

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CERTIFICATE OF SERVICE

I, Geoffrey E. Hobart, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Geoffrey E. Hobart
Geoffrey E. Hobart